

**REMARKS**

**Foreign Priority:**

Applicant thanks the Examiner for acknowledging Applicant's claim to foreign priority under 35 U.S.C. § 119(a)-(d), and for confirming that the certified copy of the priority document has been received at the Patent Office.

**Claim Rejections:**

Claims 1-15 are all of the claims pending in the present application, and currently all of the claims stand rejected.

***35 U.S.C. § 102(e) Rejection - Claims 1-2, 6-7 and 11-12:***

Claims 1-2, 6-7 and 11-12 remain rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,330,628 to Motoyama. In view of the following discussion, Applicant respectfully traverses the above rejection.

As previously asserted by the Applicant, Motoyama is directed to a system which is capable of using identifiers (such as model numbers) to determine the type of communication protocol to be used to communicate with different models and types of devices. As shown in Figure 1, a plurality of devices (items 2 through 20) are coupled to a communication interface 24, which is in turn coupled to a control/diagnostic system 26. Each of the devices (2 - 20) can use different communication protocols (such as binary language, etc.). The control/diagnostic system 26 contains a communication protocol database 28 which stores data on how each of the devices (2 to 20) communicate and what language or protocol they use. Therefore, when data is

sent from, or to, each of the devices, the system can properly communicate with each of the devices, even though they may use different communication protocols.

Applicant continues to submit that the Motoyama disclosure has little or no relevance to the present invention. Specifically, there is no disclosure of changing the content based on the processing characteristics of the image data acquisition means. To make this aspect of the invention clear, Applicant has amended the claims as shown in the previous section.

Specifically, the present invention contains “an image data processing content storage section for storing image data processing contents considering the image processing operation characteristics of the image data acquisition means assigned the identification information in response to the identification information assigned for identifying the different types of image data acquisition means.” *See* claim 1, and also claims 6 and 11. As discussed above, Motoyama does not disclose considering the image processing operation characteristics, as does the present invention. Namely, in the present invention, it is the image processing characteristics of the image data acquisition means which are considered, and not simply operational characteristics, such as a communication protocol, as in Motoyama.

Applicant submits that operational characteristics, such a communication protocols, are not image processing characteristics.

In view of the foregoing discussion, Applicant submits that Motoyama fails to disclose each and every feature of the present invention as set forth in claim 1, 6 and 11. Therefore, Motoyama fails to anticipate claims 1, 6 and 11 under the provisions of 35 U.S.C. § 102(e). Accordingly, Applicant hereby requests the Examiner reconsider and withdraw the above 35

U.S.C. § 102(e) rejection of these claims. Further, as claims 2, 7 and 12 depend on these claims, respectively, Applicant submits that these claims are also allowable, at least by reason of their dependence.

***35 U.S.C. § 103(a) Rejection - Claims 3-5, 8-10 and 13-15:***

Claims 3-5, 8-10 and 13-15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Motoyama in view of U.S. Patent No. 6,115,104 to Nakatsuka. In view of the following discussion, Applicant respectfully traverses the above rejection.

As an initial matter, Applicant submits that because claims 3-5, 8-10 and 13-15 depend on claims 1, 6 and 11, respectively, and because Nakatsuka fails to cure the deficient teachings of Motoyama, these claims are also allowable, at least by reason of their dependence.

However, additionally and independently, Nakatsuka discloses using “input characteristic information” of image input devices (for example item **40**) stored in a disk drive **34**, where this information is used in a printing process. The data can be stored by model number of the device, etc. and can include resolution, magnification, MTF characteristics, noise characteristics, tone and color characteristics. *See* Nakatsuka, col. 9, lines 50-65. However, unlike the present invention, this information is used in conjunction with input from a user who selects options such as “SHARP” or “STEREOSCOPIC” prior to the data being printed. Once this user input is selected, an image approximating unit **74** uses all of the stored image data and processes the image. *See id.* at col. 9, lines 7-45.

The Examiner asserts that it would have been obvious to incorporate the use of the image adjustment features of Nakatsuka within Motoyama to attain an image of finer quality.

However, Applicant submits there is no teaching or suggestion within either of the references for making this combination. Specifically, Motoyama is directed to communication protocols, and makes no reference to image data processing. Further, there is no evidence that the system within Motoyama would be able to function with the user interface attributes of Nakatsuka.

In view of the foregoing, Applicant submits that it would not have been obvious to one of ordinary skill in the art to combine the Motoyama or Nakatsuka references, as asserted by the Examiner. Further even if it were assumed that the references would have been combined as suggested by the Examiner, Applicant submits that the resultant combination would not teach or suggest each and every feature of the claimed invention. Therefore, the Examiner has failed to establish a *prima facie* case of obviousness with respect to claim 3-5, 8-10 and 13-15, as required under the provisions of 35 U.S.C. § 103(a). Accordingly, Applicant hereby requests the Examiner reconsider and withdraw the above 35 U.S.C. § 103(a) rejection of these claims.

**Conclusion:**

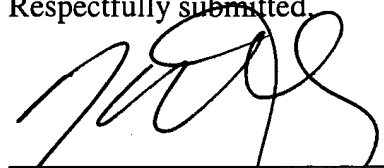
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.116  
Application Number 09/449,772

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
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